

1 HEATHER E. WILLIAMS, Bar #122664
Federal Defender
2 BENJAMIN A. GERSON, NY Bar # 5505144
Assistant Federal Defender
3 Designated Counsel for Service
2300 Tulare Street, Suite 330
4 Fresno, CA 93721-2226
Telephone: (559) 487-5561
5 Fax: (559) 487-5950

6 Attorneys for Defendant
JOSE FERNANDO GOMEZ-MOREIRA
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JOSE FERNANDO GOMEZ-
MOREIRA,

15 Defendant.
16

Case No. 1:20-cr-00151-NONE-SKO

**STIPULATION TO CONTINUE STATUS
CONFERENCE**

Date: December 2, 2020

Time: 1:00 p.m.

Judge: Hon. Sheila K. Oberto

17
18 The parties, through their respective counsel, Laura Withers, Assistant United States
19 Attorney, counsel for the government, and Benjamin A. Gerson, Assistant Federal Defender,
20 counsel for the defendant, Jose Fernando Gomez-Moreira, hereby stipulate and jointly move this
21 Court to continue Mr. Gomez-Moreira's status conference from November 4, 2020 to December 2,
22 2020.

23 Mr. Gomez-Moreira is scheduled for a hearing on a motion for bail review on before the
24 Honorable Barbara A. McAuliffe on November 2, 2020. The parties agree that there is no need for
25 a status conference to follow immediately afterward. Defense investigation is ongoing and defense
26 counsel is awaiting vital records relating to Mr. Gomez-Moreira's case.

27 The parties request this continuance with the intention of conserving time and resources
28 for both the parties and the Court. The parties agree that the delay resulting from the continuance

1 shall be excluded in the interests of justice, including but not limited to, the need for the period
2 of time set forth herein for effective defense preparation, defense investigation, and plea
3 negotiation purposes pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

4 Respectfully submitted,

5 McGREGOR SCOTT
6 United States Attorney

7 Dated: October 30, 2020

8 /s/ Laura Withers
9 LAURA WITHERS
10 Assistant U.S. Attorney

11 Dated: October 30, 2020

12 HEATHER E. WILLIAMS
13 Federal Defender

14 /s/ Benjamin A. Gerson
15 BENJAMIN A. GERSON
16 Assistant Federal Defender
17 Attorney for Defendant
18 JOSE FERNANDO GOMEZ-MOREIRA

19 **ORDER**

20 IT IS SO ORDERED.

21 Dated: **October 30, 2020**

22 /s/ Sheila K. Olerto
23 UNITED STATES MAGISTRATE JUDGE
24
25
26
27
28